

Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Matthew J. Strickler Secretary of Natural Resources David K. Paylor Director (804) 698-4000

January 15, 2021

VIA ELECTRONIC MAIL

Mr. Jody Hawks
Environmental Manager
BAE Systems, Ordnance Systems, Inc.
Radford Army Ammunition Plant
4050 Pepper's Ferry Road
Radford, Virginia 24141

Re: Multi-Pathway Risk Assessment Report for the Part B Permit Application for the Renewal of the Hazardous Waste Subpart O Explosive Waste Incinerator Permit – First Notice of Deficiency Response - Approval Radford Army Ammunition Plant (RAAP), Radford, Virginia EPA ID#: VA1210020730

Dear Mr. Hawks:

The Virginia Department of Environmental Quality's Office of Financial Responsibility and Waste Programs (DEQ) has completed the review of the Radford Army Ammunition Plant (RAAP) facility's First Notice of Deficiency (NOD) Response for the Multi-Pathway Risk Assessment Report for the Energetic Waste Incinerator Permit for the Storage and Treatment of Hazardous Waste (EWI MPRA Report First NOD Response) dated December 3, 2020 and received on December 10, 2020. The EWI MPRA Report First NOD Response was received in response to the First NOD sent on November 10, 2020.

Based on the review of the EWI MPRA Report First NOD Response the DEQ has determined that all comments have been resolved and the proposed revisions to the EWI MPRA Report have been incorporated. The EWI MPRA Report is now approved and finalized.

DEQ will now prepare a draft version of the renewal RCRA permit for the EWI for RAAP, EPA Region III and the DEQ Regional Office's formal review within 30 days (February 15, 2021).

Mr. Jody Hawks Page 2 January 15, 2021

If you have any questions concerning the information provided in this letter, please contact me at (804) 698-4467 or by email at Ashby.Scott@deq.virginia.gov.

Sincerely,

Ashby R. Scott

Hazardous Waste Permit Writer Office of Financial Responsibility and Waste

Programs

cc: Central Hazardous Waste Files
Mindy Lemoine, EPA, Region III (3LC50)
Nikki Herschler, Rebecca Wright, DEQ BRRO
Leslie Romanchik, Kyle Newman, Brett Fisher, Brian Burton, DEQ, CO

Jim McKenna, Radford Army Ammunition Plant